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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION
12

13 UNITED STATES OF AMERICA,)
14 Plaintiff,)
15 v.)
16 JONATON GODOY,)
17 Defendant.)
18 _____)

No. CR 12-0274 SBA

STIPULATION AND ~~PROPOSED~~
ORDER FOR AN EXCLUSION OF TIME
FROM MAY 15 17, 2012 THROUGH
MAY 30, 2012 FROM CALCULATIONS
UNDER THE SPEEDY TRIAL ACT

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21 The defendant, Jonaton Godoy, represented by Karli Sager, and the government,
22 represented by Cynthia Frey, Assistant United States Attorney, appeared before the Honorable
23 Donna M. Ryu on May 15, 2012 for a detention hearing. The parties agreed to continue the
24 hearing to May 23, 2012 and to set the status conference for May 30, 2012. The parties agree
25 that time is excluded under the 18 U.S.C. § 3161, the Speedy Trial Act.

26 The defendant agreed that an exclusion of time is appropriate under the Speedy Trial Act
27 between May 15, 2012 and May 30, 2012 for purposes of effective preparation of counsel, in
28 order to provide defense counsel with adequate time to review the discovery, conduct an

STIPULATION AND ~~PROPOSED~~ ORDER
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1 investigation, and consult with the defendant. In addition, the defendant agrees to exclude for
2 this period of time any time limits applicable under 18 U.S.C. § 3161. The parties represent that
3 granting the continuance, in order to provide defense counsel with adequate time to review the
4 discovery, conduct additional investigation, and consult with the defendant, is necessary for
5 effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §
6 3161(h)(7)(B)(iv). The parties also agree that the ends of justice served by granting such a
7 continuance outweigh the best interests of the public and the defendant in a speedy trial. 18
8 U.S.C. § 3161(h)(7)(A).

9 SO STIPULATED:

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12 MELINDA HAAG
United States Attorney

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14 DATED: May 22, 2012

15 /s/
CYNTHIA M. FREY
Assistant United States Attorney

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17 DATED: May 22, 2012

18 /s/
KARLI SAGER
Attorney for JONATON GODOY

1 The Court finds that time is appropriately excluded under the Speedy Trial Act between
2 May 15, 2012 and May 30, 2012 for purposes of effective preparation of counsel, in order to
3 provide defense counsel with adequate time to review the discovery, conduct an investigation,
4 and consult with the defendant. The Court also finds that failing to exclude the time between
5 May 15, 2012 and May 30, 2012 would unreasonably deny the defendant and counsel the
6 reasonable time necessary for effective preparation, taking into account the exercise of due
7 diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served
8 by excluding the time between May 15, 2012 and May 30, 2012 from computation under the
9 Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial.
10

11 Therefore, IT IS HEREBY ORDERED that the time between May 15, 2012 and May 30,
12 2012 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C.
13 §§ 3161(h)(7)(A), and 3161(h)(7)(B)(iv).
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16 DATED: 5/22/2012

